

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

---

Young Americans for Liberty at University of  
Massachusetts, Amherst; and Nicholas  
Consolini,

Plaintiffs,

v.

Robert J. Manning, R. Norman Peters, James R.  
Buonomo, Mary L. Burns, Derek J. Dunlea,  
Robert Epstein, David G. Fubini, Maria D.  
Furman, Stephen R. Karam, Gray R. Milkowski  
Michael V. O'Brien, Kerri E. Osterhaus-Houle,  
Imari K. Paris Jeffries, James A. Peyser, Malinda  
E. Reed, Samantha E. Reid, Elizabeth D.  
Scheibel, Henry M. Thomas III, Steven A.  
Tolman, Victor Woolridge, Charles F. Wu, and  
Camilla D. Yu, each in their individual capacity  
and in their official capacities as members of the  
Board of Trustees of the University of  
Massachusetts; Marty Meehan, individually and  
in his official capacity as President of the  
University of Massachusetts; Kumble R.  
Subbaswamy, individually and in his official  
capacity as Chancellor, University of  
Massachusetts Amherst; and Enku Gelaye,  
individually and in her official capacity as Vice  
Chancellor for Student Affairs and Campus Life,  
University of Massachusetts Amherst,

Defendants.

---

Case No. 3:18-cv-30003

**Corporate Disclosure/  
Statement of Interest**

As required by FRCP 7.1 Plaintiffs in this case provide the following information to the court:

The plaintiffs do not have a parent corporation and do not issue stock.

Respectfully submitted this 8th day of January, 2018:

/s/ Andrew D. Beckwith

Andrew D. Beckwith (MA BBO 657747)  
MASSACHUSETTS FAMILY INSTITUTE  
400 TradeCenter Suite 1950  
Woburn, Massachusetts 01801  
Tel: (781) 569-0400  
andrew@mafamilly.org

J. Caleb Dalton\*  
M. Casey Mattox\*  
ALLIANCE DEFENDING FREEDOM  
440 1st St NW  
Suite 600  
Washington, DC 20001  
Tel.: 202-393-8690  
Fax: 202-347-3622  
cdalton@ADFlegal.org  
cmattox@ADFlegal.org

*\*Pro hac vice application to follow*

Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8th, 2018, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all parties.

Dated this 8th day of January, 2018, by:

s/Andrew D. Beckwith  
Andrew D. Beckwith  
(MA BBO 657747)  
MASSACHUSETTS FAMILY INSTITUTE  
400 TradeCenter Suite 1950  
Woburn, Massachusetts 01801  
Telephone: (781) 569-0400  
Email: andrew@mafamilly.org